

WOLLMUTH MAHER & DEUTSCH LLP

James N. Lawlor, Esq.  
500 Fifth Avenue, 12th Floor  
New York, New York 10110  
Tel: (212) 382-3300  
Fax: (212) 382-0050  
Email: jlawlor@wmd-law.com

*Counsel for Cithara Global Multi-Strategy SPC -  
Bosideng Industry Investment Fund SP, Star  
Freight & Trading Co., Limited, and Mars Partner  
Limited.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

XINYUAN REAL ESTATE CO., LTD.,

Debtor.

Chapter 11

Case No.: 25-10745-pb

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF NOTICES  
AND DOCUMENTS, AND REQUEST FOR ADDITION TO MATRIX**

**PLEASE TAKE NOTICE** that pursuant to section 1109 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned enters an appearance in the above-referenced case on behalf of Cithara Global Multi-Strategy SPC - Bosideng Industry Investment Fund SP, Star Freight & Trading Co., Limited, and Mars Partner Limited (together, the “Petitioning Creditors”) and requests service of all notices and documents herein upon:

James N. Lawlor, Esq.  
Wollmuth Maher & Deutsch, LLP  
500 Fifth Avenue  
New York, New York 10110  
(212) 382-3300  
jlawlor@wmd-law.com

Counsel also requests that all ECF/electronic notices be sent to jlawlor@wmd-law.com.

**PLEASE TAKE FURTHER NOTICE** that the foregoing request for service includes all pleadings of any kind, including, without limitation, all notices, applications, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted or conveyed, related in any way to the above-captioned Debtor, its property, or its estate.

**PLEASE TAKE FURTHER NOTICE** that neither this *Notice of Appearance, Request for Service of Notices and Documents, and Request for Addition to Matrix* (the “Notice”) nor any prior or subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive any substantive or procedural rights of the Petitioning Creditors including, without limitation, (i) the right to have final orders in non-core matters arising in or related to the above-captioned chapter 11 cases entered only after *de novo* review by a district court judge; (ii) the right to trial by jury in any proceedings so triable in these chapter 11 cases or in any case, controversy, or proceeding; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) the right to object to the jurisdiction of this Bankruptcy Court; and (v) an election of remedies.

**PLEASE TAKE FURTHER NOTICE** that this Notice is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments to which the Petitioning Creditors are or may be entitled under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against a debtor or any other entity either in these cases or in any other action are expressly reserved.

Dated: April 15, 2025  
New York, New York

Respectfully submitted,

**WOLLMUTH MAHER & DEUTSCH LLP**

*/s/ James N. Lawlor* \_\_\_\_\_

James N. Lawlor  
500 Fifth Avenue, 12th  
Floor New York, New  
York 10110  
Tel: (212) 382-3300  
Fax: (212) 382-0050  
Email: jlawlor@wmd-law.com

*Counsel for Cithara Global Multi-Strategy SPC -  
Bosideng Industry Investment Fund SP, Star Freight &  
Trading Co., Limited, and Mars Partner Limited.*